

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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EDGAR SANCHEZ,

Plaintiff,

-against-

EZ PARKING CORPORATION, EK PREMIER  
SERVICES LLC, and YAN MOSHE, individually,

Defendants.

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**Case No.: 1:23-cv-4052 (AMD) (VMS)**

**DEFENDANT EK PREMIER  
SERVICES LLC'S  
RULE 26 DISCLOSURES**

Defendant, EK Premier Services LLC, by and through its undersigned counsel, makes the following disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure ("Rule").

**(A) INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION**

**RESPONSE:**

1. Plaintiff Edgar Sanchez ("Plaintiff"). This individual has knowledge about the events complained of.
2. Defendant EK Premier Services LLC ("EK"), Rule 30(b)(6) representative, c/o Sage Legal LLC. This individual has knowledge about the claims and defenses in this case.
3. Defendant Yan Moshe ("Moshe"), c/o The Russell Friedman Law Group, LLP. This individual has knowledge about the claims and defenses in this case.
4. All other witnesses identified by Plaintiff and Moshe.

**(B) RELEVANT DOCUMENTS**

**RESPONSE:**

EK possesses documents and tangible things that are relevant to the disputed facts including but not limited to pay stubs and Plaintiff's correspondence with EK. All of the documents referred to above may be inspected at the offices of Sage Legal LLC.

**(C) COMPUTATION OF DAMAGES**

**RESPONSE:**

Not applicable.

**(D) INSURANCE COVERAGE**

**RESPONSE:**

EK has no knowledge at this time of any relevant insurance agreement under which an insurance business may be liable to satisfy part or all of a judgment, or reimburse for payments made to satisfy a judgment, in this case.

EK reserves the right to seasonably supplement these initial disclosures.

Dated: Jamaica, New York

April 3, 2024

Respectfully submitted,

**SAGE LEGAL LLC**

/s/ Emanuel Kataev, Esq.

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